

NICHOLAS A. TRUTANICH
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration
MICHAEL K. MARRIOTT, CSBN 280890
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (415) 977-8985
Facsimile: (415) 744-0134
E-Mail: Michael.Marriott@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
LAS VEGAS DIVISION**

MARIA WOZNIAK,)	Case No: 2:18-cv-02221-APG-VCF
)	
Plaintiff)	
)	
v.)	STIPULATION FOR EXTENSION OF
)	TIME TO FILE DEFENDANT'S CROSS
)	MOTION TO AFFIRM
NANCY A. BERRYHILL, Acting)	
Commissioner of Social Security,)	(Second Request)
)	
Defendant.)	

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests an extension of time of fourteen days to Wednesday, June 12, 2019, to prepare and file her cross motion to affirm. This is the Commissioner's first request for an extension.

Defendant respectfully requests this extension of time because of a very heavy workload, including ten district court merits briefs due in the next two weeks, as well as a Ninth Circuit responsive brief to complete.

1 On May 29, 2019, Plaintiff's counsel informed Defendant by email that he had no
2 objection to this extension.

3
4 Respectfully submitted,

5 Date: May 29, 2019

SCHIFFMAN LAW OFFICE, P.C.

6 By: /s/ Anna Schiffman*

7 ANNA SCHIFFMAN

8 *authorized by email May 29, 2019

9 Attorney for Plaintiff

10 Date: May 29, 2019

NICHOLAS A. TRUTANICH

11 United States Attorney

12 By: /s/ Michael K. Marriott

13 MICHAEL K. MARRIOTT

14 Assistant Regional Counsel

15 Attorneys for Defendant

16 Of Counsel

Jeffrey Chen

17 Assistant Regional Counsel

18 Social Security Administration

19
20 IT IS SO ORDERED.

21
22 DATE: 8-2-2019

23 
HONORABLE CAM FERENBACH

24 United States Magistrate Judge

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CERTIFICATE OF SERVICE

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

Anna Schiffman
Schiffman Law Office, P.C.
4506 N. 12th St.
Phoenix, AZ 85014

Date: May 29, 2019

NICHOLAS A. TRUTANICH
United States Attorney

By: /s/ Michael K. Marriott
MICHAEL K. MARRIOTT
Assistant Regional Counsel

Attorneys for Defendant